

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Robert Michael Greenwood – KC4VG

I strongly support No Code International's petition to eliminate the Morse code proficiency examination requirement for amateur radio licenses.

The importance of Morse code is greatly diminished, and there is no longer any legitimate reason for retaining Morse code proficiency as a requirement for amateur radio operators. Few, if any, commercial or government radio services use radio telegraphy today, eliminating the need to maintain a pool of Morse code trained operators.

I am concerned that we lose many potential new amateur radio operators each year because of the Morse code proficiency requirement. Many young (and not so young) potential amateur radio operators see no valid reason for having to prove Morse code proficiency in order to obtain full amateur radio privileges. They are right. Others, estimated by some as high as 30 percent of the population, are unable to learn Morse code despite being very talented in other areas.

The most important reason for retaining Morse code testing and the only reason cited by the Commission in its most recent complete review of Part 97 amateur rules (WT Docket No. 98-143) was to meet ITU regulations. Now that the ITU no longer requires Morse code testing, the Commission should eliminate that requirement for U.S. amateur radio operators. Many forward looking national administrations, including the United Kingdom, Switzerland, Austria, Australia, Belgium, Germany, Ireland, The Netherlands, Norway, New Zealand and Singapore have already eliminated, or are in the process of eliminating the requirement for Morse code proficiency testing.

Some may argue that retention of Morse code proficiency testing will provide a filter to weed out potentially poor operators. My own personal observations are that Morse code proficiency is a very poor predictor of whether one will be a good amateur radio operator.

Radio telegraphy is very much part of the amateur radio heritage, but in the final analysis, it is one of many operating modes available to radio amateurs today, nothing more, nothing less. Those who wish to use Morse code will learn, but it should not be a requirement.

I strongly urge the Commission to quickly enact the changes proposed by NCI and defer any considerations of other issues such as band segmentation, number of license classes, and operator privileges, since that would further delay resolving this important issue.

Respectfully submitted,

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